



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

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COMMISSIONER

January 10, 2007

Mr. Orlando Monaco
Department of Navy
Base Realignment and Closure
Program Management Office-Northeast
4911 South Broad Street
Philadelphia, PA 19112-1303

Re: Site 9, Soil Sampling Corrective Action Plan
Naval Air Station, Brunswick, Maine

Dear Mr. Monaco:

Pursuant to Section VI of the Naval Air Station, Brunswick, Maine Federal Facility Agreement (Oct 1990), as amended, the Maine Department of Environmental Protection (MEDEP) has reviewed the "Proposed Soil Sampling Corrective Action Plan and Letter Work Plan for N62472-01-D-0809, Site Soil Removal Action", dated December 04, 2006, (received via email on December 27, 2006) prepared by Oak Environmental Consultants. Based on that review MEDEP has the following comments and issues.

General Comments:

1. It is not clear from this corrective plan whether the existing ash material will be broken into 500 ton piles for sampling or sampled in segments as proposed in the Final Work Plan (Oct 2005). Please clarify this in the work plan.
2. The tables must be titled and numbered for easy reference.
3. For easy reference please add page numbers to the corrective action plan.

Specific Comments:

4. Para 1: "The following represents OAK's revision to the Letter Work Plan (LWP) to address the quality and reliability of chemical data that has been collected to date on the project."
 - a.) MEDEP is unfamiliar with the above referenced Letter Work Plan. Does Oak mean the Final Work Plan and Site Safety and Health Plan (Oct 2005)? Please specify.
 - b.) MEDEP in its letter dated October 13, 2006, stated that due to the lack of existing sample locations that the comparison was not feasible and that re-sampling was not necessary. This sentence was left from the earlier workplan and should be changed to state the objectives of this corrective action plan and although some re-sampling will be necessary it should not focus on re-sampling but on moving the project forward now that hazardous waste has been identified. The corrective action should be divided into: 1) how to sample and handle the excavated material in P-6, P-7, and P-8, and 2) how to sample and handle material to be excavated.

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5. Hazardous Waste Pile:

a.) Please change the section title to: *Existing Hazardous Waste Pile*. MEDEP recommends adding a reference for the attachment for the Hazardous Waste Management included with the Letter Workplan in this section. (eg., *See attachment ____ [provide number]) SOP – Hazardous Waste Management.*)

b.) The description of the handling of material that may overlay the hazardous waste pile is acceptable, but MEDEP is unclear what "waste disposal characterization parameters" refers to. Please clarify in the text.

6. Construction Water:

a.) Para 1: MEDEP was under the impression that the water in the frac tanks had been tested and discharged to the Brunswick Sewer District. Please check the first paragraph and update, as necessary.

b.) Para 2: The stockpile of sediment must be placed on poly and covered as has been done with the other stockpiles. Please address this in the text.

c.) The filter fabric must be appropriately sized to capture the silt (eg., non woven needle punched 6 oz fabric mat). Please specify what filter fabric will be used. The underlying gravel should not be affected if the water tests non hazardous. However, if the water were to test hazardous, then the gravel may need to be washed or sampled and disposed in an appropriate manner.

7. Overview of Re-Sampling:

a.) Para. 1: "*A summary of material sampling ...*" It would be helpful to title or number the table for easy reference.

b.) "Note: The construction and demolition debris (CDD) was removed from the areas east of the ash excavation; some "confirmatory" samples were collected in this area (outside the ash excavation) to confirm that no ash was present underlying the CDD."

MEDEP assumes that that the confirmatory samples were to determine that no ash material washed onto the surface from the CDD pile and not that there is no ash buried below ground surface. (That will need to be determined by the removal and subsequent sampling.) Please clarify.

c.) Also please provide the sample IDs referred to in this statement for clarity.

8. Confirmatory Samples (first table)

a.) As written, the text in the LWP Sampling Plan does not make sense. The side walls, according to figure 1, show no side wall sample locations (unless they are located wrong) so only the bottom of the excavation could be re-sampled. MEDEP suggests revising this to say: *Once the final excavation boundaries have been established by visual and/or PID readings, confirmatory samples will be collected per the approved Workplan and sampling grid... Confirmation sample points that still exist from the 2006 excavation will be re-sampled."*

b.) If Navy or its contractor have an updated estimate of the total number of locations based on the current excavation dimensions, or a revised figure with locations, one should be provided to update Figure 4a from the original workplan.

c.) The plan should clarify how dewatering will be handled to facilitate bottom samples, if all the confirmation samples are taken at once as the table implies. MEDEP understood that bottom samples were being taken as the excavation progressed to avoid having to keep large areas dewatered.

9. Soil/Sediment from Frac Tanks, LWP Sampling Plan (First table): Please cite the section of the original Workplan this information can be found (i.e., Section 10.0). Also please either include the information in paragraph 4 (Construction Water) of this LWP or also cite it in the column.

10. Methodology for Composite Sampling:

a.) Please revise the first sentence or the section title to read "Composite Total VOC Sampling" for clarity, to distinguish from the TCLP composite sampling.

b.) Please make it clear that the existing stockpiled ash material in P6, P7, P8 and the unnumbered pile of ash (labeled as ASH on figure 1) will be broken into 500 ton piles for sampling and that any newly excavated material will be staged in 500 ton piles.

11. Table (unlabeled):

a.) Please add the Chemical Analysis as shown in Table 1 of the original workplan to the table for the various media.

12. Table (unlabeled), Ash: LWP Sampling Plan:

a.) According to Figure 1 in addition to ash piles, P6, P7, and P8, there is an unlabeled ash pile. Please include this in the description.

b.) Also, please make it clear in the text or in this table that both the current ash piles and the material to be excavated will be staged into 500 ton piles for sampling for disposal purposes.

c.) The text must specify "composite total VOC" or "composite TCLP" or whatever is appropriate for clarity.

13. Table (unlabeled), Construction and Demolition Debris (CDD):

"All CDD material are still on-site in three separate piles." One CDD pile was sampled in December 2006 so that it could be shipped off site. Please revise as necessary.

14. Table (unlabeled), Loam and Overburden:

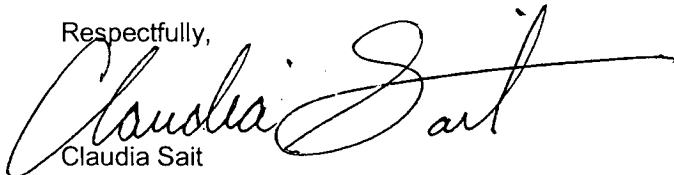
a.) Please specify the analysis for "backfill parameters" and waste stockpile analysis in the table. The table should also specify that if the material is not acceptable for backfill that the waste stockpile parameters will be used to determine disposal. A pesticides analysis must be performed if the material is to be used as backfill.

b.) Please add what criteria are being used for a "backfill standard" or identify the section and page of the workplan where this information is provided.

15. Re-Mobilization: "OAK will provide sufficient notice (no less than 48 hours) to the Navy prior to this sampling to allow for coordination with appropriate oversight personnel." Please change to seven (7) days as stated in paragraph 1 of this LWP.
16. Figure 2: The figure provided with this workplan depicts the extent of the excavation and, to some degree, the sampling locations however some of the sampling locations are outside the extent of the excavation (S9-C10-B7-1, S9-C10-SW-2, & S9-C10-SW2) and there is only one sampling location (S9-G10-SW8-1) shown where regulators were told that the ash was removed and confirmation samples taken. When MEDEP toured the site in July we were told that sampling locations were not flagged per the workplan but GPS's, so the information should be available, if the SOP was followed. Please correct the figure or at a minimum explain the discrepancies in the figure or the work performed.

Please contact me at (207) 287-7713 or claudia.b.sait@maine.gov, if you have any questions or comments.

Respectfully,

A handwritten signature in black ink, appearing to read 'Claudia Sait', with a long horizontal flourish extending to the right.

Claudia Sait
Project Manager-Federal Facilities
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Cf: File
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